HLW & FD

EIS PROJECT - AR/PF
Control # DC-62

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Comment:
Comments on the
Idaho high-level waste and facilities disposition draft environmental impact statement

Snake River Alliance

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The following comments and questions are submitted on behalf of the 1,300 dues-paying members of the Snake River Alliance, an Idaho-based grassroots group that has monitored activities at the Idaho National Engineering and Environmental Laboratory since 1979.

67-1 IX.C(2) We would like to thank the Department of Energy for extending the public comment period. In the your own words this document details "the largest, most expensive, and technically complex environmental management project at INEEL," and therefore the additional time was helpful.

67-2 III.E(1) The Alliance concurs with the Department's intent, as analyzed in all alternatives except "no action", to solidify the remaining liquid waste and eventually place the calcine in a less dispersible form. However, given that there is no repository in existence to receive this waste, any assumption of such a repository should be dropped from the final EIS. Presently, the DEIS is too influenced by the

67-3 III.F.1(2) assumption of a near-term High-level waste repository, and by the 1995 settlement agreement, and not enough by a fundamental need to better isolate the waste from the environment where it resides. Overall, there is too little

67-4 III.D.1(1) concern for environmental protection in this DEIS.

67-5 VII.A(4) The DEIS's limited scope makes it nearly useless as an analytical tool in terms of making the decisions it aims to make. Probably the two most important variables in analyzing these alternatives are: (1) the question of technical risk associated with an alternative (in other words, Will it work?); and (2) the costs of the alternative. Both of these considerations are outside the scope of the DEIS.

67-6 VII.A(4) Without cost or technical viability analysis, the ROD will be baseless. Also, the EIS scopes out considering that Yucca Mtn will not accommodate INEEL waste (because of RCRA issues). Therefore, this EIS is analyzing alternatives to come to the following conclusion: If INEEL were not bound by the realities of the current repository situation; if INEEL were not bound by the scientific realities of the physical world; and, if INEEL had all the money in the world, this is the option we would choose.



Separations options

67-7 III.D.3(3) Clearly the "separations" alternatives analyzed in the DEIS are not in the best interest of environmental protection, and are instead driven by the current repository situation and a burning need to fulfill the terms of the settlement agreement. These alternatives, Planning Basis, Transuranics Separations and Full Separations, if they were to work, and that is a big if, might reduce the "High-level" waste volume, but in the process, the overall volume of waste would increase. In the real world this would not decrease the overall danger of the

67-8 III.D.3(1) waste. In fact, if you were to decide to leave the "low-level" waste grout fraction in the tanks, you would after spending billions of dollars, be leaving the hottest fraction and greatest near-term threat behind. It should also be noted that the "Hanford Tank Waste Task Force" recently recommended that the DOE forgo pursuit of this technology because of the tremendous cost and technical uncertainty. In addition, the Transuranics Separations alternative involves a gre

67-9 III.D.3(1) ater risk of a criticality accident as admitted in the document.

Defining High-level waste

67-10 V(9) Let's please continue to be consistent on the definition of high-level waste and not further confuse the public. The Office of Environmental Management defines high-level waste (HLW) as "highly radioactive material containing fission products, traces of uranium and plutonium, and other transuranic elements, that result from chemical processing of spent nuclear fuel." The sodium bearing waste while not as radioactive as most batches of HLW, absolutely meets the basic criteria of the definition in that it resulted from chemical processing of spent fuel and contains fission products, as well as transuranics. Therefore, the DOE's contention that this waste is not hlw is out of line.

Conflicting Flood Plain studies

67-11 VIII.C(5) The U.S. Geological Survey estimates the INTEC lies within the 100-year flood plain while the U.S. Bureau of Reclamation estimates 500 years. Because we are dealing with some of the dangerous material known to man, we recommend that the DOE assume the more conservative USGS estimate.

The Calciner

67-12 VII.A(6) We request that the DOE inform the public about its decision regarding pursuit of permitting the calciner under the new MAC guidelines as soon as this decision is made, and not wait until the NEPA process is concluded. The calciner is integral to many of the alternatives in the DEIS and also the 1995 settlement agreement.